



THE STATE

Of *ALASKA*

GOVERNOR MIKE DUNLEAVY

Citizens' Advisory Commission on Federal Areas

August 6, 2026

Carla Bock
Department of Interior
Assistant Director National Conservation Lands and Community Partnerships U.S.
Bureau of Land Management
1849 C St. NW, Room 5646
Washington, DC 20240

Submitted electronically to:
<https://www.regulations.gov>

Subject: Policy Review: BLM Manual 6340, Management of Designated Wilderness Areas

Dear Director Bock:

To Whom It May Concern:

The Citizens' Advisory Commission on Federal Areas (CACFA) appreciates the opportunity to provide comments on the proposed revisions to BLM Manual 6340, Management of Designated Wilderness Areas. CACFA's statutory role is to evaluate federal land management actions affecting Alaska, and we welcome the chance to contribute to this important policy review.

Congressional direction relevant to wilderness management in Alaska includes the Wilderness Act of 1964, the Federal Land Policy and Management Act (FLPMA) of 1976, and most importantly, the Alaska National Interest Lands Conservation Act (ANILCA) of 1980. ANILCA created a distinct legal guideline for Alaska and defines the terms under which Congress designated wilderness across the state. Its provisions modify how federal wilderness is managed in Alaska and include specific statutory allowances that differ from general wilderness prohibitions found in the Wilderness Act.

Because there are no wilderness designated areas in Alaska, it is essential that BLM Manual 6340 clearly recognize and preserve the management hierarchy Congress established. When ANILCA provisions differ from the Wilderness Act, ANILCA governs. This principle is central to maintaining the legal integrity of wilderness administration on BLM lands in Alaska.

CACFA recommends incorporating Alaska specific language for Manual 6340 similar to the "BLM-Utah Additional Guidance for Manual 6320". Or like language in BLM Manual 6330 that simply states, this policy does not apply to Alaska.

CACFA further encourages BLM to ensure that staff involved in wilderness management receive training on Alaska-specific statutory requirements under ANILCA. Clear articulation of these obligations within Manual 6340 will help federal managers administer Designated Wilderness Areas in a

manner that complies with federal law and respects the unique circumstances of Alaska's communities and landscapes.

We appreciate the opportunity to comment on the proposed revisions to BLM Manual 6340 and look forward to continued engagement with the Bureau on federal land management issues affecting Alaska. Please contact CACFA if additional clarification or information would be helpful during your review process.

Sincerely,

A handwritten signature in cursive script that reads "Kim Griffith".

Kim Griffith

Executive Director

Citizens' Advisory Commission on Federal Areas (CACFA)